

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NADIA SELLERS,

Plaintiff,

v

JPMORGAN CHASE BANK, N.A.,
Improperly sued as CHASE AUTO
FINANCE,

Defendant.

Case No. _____

Hon.

55th District Court:
Case No. 2024-243722-SC
Hon. Richard L. Hillman

Nadia Sellers 4155 Mariner Lane Okemos, MI 48864 <i>Pro Se</i>	Davina A. Bridges (P85597) DICKINSON WRIGHT PLLC 200 Ottawa Ave NW #1000 Grand Rapids, MI 49503 (616) 458-1300 dbridges@dickinsonwright.com <i>Attorneys for Defendant</i>
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DEFENDANT JPMORGAN CHASE BANK, N.A.'S
NOTICE OF REMOVAL

TO: Clerk of the Court

Nadia Sellers
4155 Mariner Lane
Okemos, MI 48864

Pro Se

Defendant JPMorgan Chase Bank, N.A. ("Chase") improperly sued as Chase Auto Finance, through its attorneys Dickinson Wright PLLC, hereby removes this action from the 55th District Court, State of Michigan, where it is pending, to the

United States District Court for the Western District of Michigan, Southern Division.

In support of its Notice of Removal, Chase states as follows:

1. On or about September 3, 2024, Plaintiff Nadia Sellers (“Plaintiff”) commenced this action against Chase in the 55th District Court (Small Claims) for the County of Mason, State of Michigan, by filing a Complaint in Case No. 2024-243722-SC, assigned to the Honorable Richard L. Hillman.

2. The 55th District Court is located in the Western District of Michigan, Southern Division.

3. Chase accepted service of the Affidavit and Claim (“Affidavit”) via registered mail on September 10, 2024. The date stamped Affidavit and Claim is attached hereto as **Exhibit A**.

4. The Affidavit from the 55th District Court constitute all process, pleadings, and orders served on Chase in this action.

5. This Notice of Removal is timely under 28 U.S.C. § 1446(b) because it is filed within thirty (30) days after Chase accepted service of the State Court Affidavit.

6. This Court has subject-matter jurisdiction under 28 U.S.C. §1331 based upon the following:

- a. Plaintiff alleges a violation of the Fair Credit Reporting Act (15 U.S.C. § 1681 *et seq.*) (“FCRA”), which is a federal consumer protection statute.
- b. Accordingly, Plaintiff’s FCRA claim arises under the laws of the United States and could have been originally filed in this Court.
- c. This Court therefore has federal question subject-matter jurisdiction.

7. Further, pursuant to 28 U.S.C. § 1367(a), this Court has supplemental jurisdiction over all remaining claims, as they are so related to the FCRA claim that they form part of the same case or controversy under Article III of the United States Constitution.

8. This action therefore is removable to this Court pursuant to 28 U.S.C. § 1441.

9. Service and notice of the filing of this Notice of Removal will be given to all parties and a true and correct copy of the Notice of Removal will be filed with the Clerk of the Court for the 55th District Court in the County of Mason, State of Michigan, as provided by law.

10. Notice of Filing of this Notice of Removal is attached as **Exhibit B** (without exhibits).

Respectfully submitted:

DICKINSON WRIGHT PLLC

/s/ **Davina A. Bridges**

Davina A. Bridges (P85597)

DICKINSON WRIGHT PLLC

200 Ottawa Ave NW #1000

Grand Rapids, MI 49503

(616) 458-1300

dbridges@dickinsonwright.com

Attorneys for Defendant

Dated: October 8, 2024

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2024, a copy of the above filing was served on Plaintiff Nadia Sellers via certified mail at:

Nadia Sellers
4155 Mariner Lane
Okemos, MI 48864
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Respectfully submitted,

/s/ Davina A. Bridges
Davina A. Bridges (P85597)
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Attorneys for Defendant

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